IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

FINANCIAL EDUCATION SERVICES, INC., et al.,

Defendants.

Case No. 2:22-cv-11120-BAF-APP

Hon. Bernard A. Friedman

FTC'S RECOMMENDATION FOR TEMPORARY RECEIVER

In connection with its *Ex Parte* Motion for Temporary Restraining Order with an Asset Freeze, Appointment of Receiver, and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue ("TRO Motion"), the Federal Trade Commission ("FTC") recommends that the Court appoint Patrick A. Miles, Jr. as a temporary receiver in this case. In support of its recommendation, the FTC states as follows:

- 1. The grounds for the appointment of a temporary receiver are set forth in the FTC's TRO Motion.
- 2. Mr. Miles has expressed a willingness to serve as temporary receiver.
- 3. Mr. Miles's areas of expertise and experience make him eminently qualified to manage the receivership proposed in this action. Mr. Miles has been practicing law for 30 years. He is a former federal prosecutor, having served as the United

- States Attorney for the Western District of Michigan from 2012 through 2017.

 As United States Attorney, his office prosecuted numerous pyramid schemes giving Mr. Miles significant experience in this field. Mr. Miles's qualifications are more fully set forth in his resume attached hereto as **Attachment A**.
- 4. As an attorney in private practice, Mr. Miles has focused on corporate and business law and transactions, monitorships and receiverships, internal investigations, and white-collar matters. Meanwhile, his firm, Barnes & Thornburg LLP, has extensive experience with receiverships in government law enforcement actions, having been appointed, or represented, receivers in more than two dozen actions brought by the FTC, SEC, and CFTC. Mr. Miles and his firm have regularly repatriated foreign assets, and marshalled, collected, and ultimately sold domestic assets, as well as making initial determinations as to whether receivership entities can operate lawfully and profitably. His firm's qualifications are more fully set forth in their Federal Equity Receivership Overview attached hereto as Attachment B.
- Several representative recent receivership matters include FTC et al. v. Sellers
 Playbook, Inc., Case No. 0:18-cv-02207-DWF-TNL (D. Minn.) (business opportunity scam); FTC v. Ecological Fox, LLC, Case No. 1:18-cv-03309-PJM
 (D. Md.) (real estate investment scam); FTC v. AWS, LLC, Case No. 2:18-cv-00442-JCM-PAL (D. Nev.) (business opportunity scam); FTC v. Bob Robinson,

- LLC, Case No. 4:17-cv-02411 (S.D. Tex.) (business opportunity scam); FTC v. Al DocPrep Inc., Case No. 2:17-cv-07044-SJO-JC (C.D. Cal.) (student loan debt relief and mortgage assistance relief services scam), FTC v. M&T Financial Group, Case No. 2:17-cv-06855-ODW-PLA (C.D. Cal.) (student loan debt relief scam), and CFTC v. AlphaMetrix, Inc., Case No. 1:13-cv-07896 (N.D. Ill.) (investment scam).
- 6. As detailed above, Mr. Miles has significant experience managing complex assets located across the United States and globally, and in managing complex administrative issues in multiple jurisdictions. His firm also has extensive experience in asset tracing and recovery.
- 7. Mr. Miles is willing to discount his and his firm's rates because this case involves a government plaintiff. If appointed as receiver, he would mark down his hourly rate to \$595 (a roughly 15% discount from his normal rate), and offer similar discounts for his firm.
- 8. Mr. Miles has indicated that neither he nor his firm have conflicts of interest should he be appointed as temporary receiver.

Dated: May 23, 2022 Respectfully submitted,

/s/Gregory A. Ashe

GREGORY A. ASHE K. MICHELLE GRAJALES JULIA E. HEALD Federal Trade Commission 600 Pennsylvania Avenue NW Washington, DC 20580

Telephone: 202-326-3719 (Ashe) Telephone: 202-326-3172 (Grajales) Telephone: 202-326-3589 (Heald)

Facsimile: 202-326-3768

Email:gashe@ftc.gov, mgrajales@ftc.gov,

jheald@ftc.gov

DAWN N. ISON United States Attorney

PETER A. CAPLAN (P30643) Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226 Telephone: 313-226-9784 Email: peter.caplan@usdoj.gov

Attorneys for Plaintiff FEDERAL TRADE COMMISSION

ATTACHMENT A

Partner

Barnes & Thornburg LLP

Contact Information

Suite 1000

171 Monroe Avenue, N.W. Grand Rapids, Michigan 49503

E-mail: <u>pmiles@btlaw.com</u>

Office Telephone: 616/742-3939
Office Facsimile: 616/742-3999
Mobile Phone: 616/540-2833
https://btlaw.com/en/people/patrick-miles

Assistant(s): Nancee Holzgen (M-W)

Anita Isenga

Assistant(s) E-mail: nholzgen@btlaw.com

anita.isenga@btaw.com

Assistant(s) Telephone: 616/742-3964 (Holzgen)

616/742-3927 (Isenga)



Education

Harvard Law School

Cambridge, Massachusetts Juris Doctor, 1991

Aquinas College

Grand Rapids, Michigan Bachelor of Science in Business Administration cum laude, 1988

Great Lakes Christian College

Lansing, Michigan

Legal Employment

Barnes & Thornburg LLP

Grand Rapids, Michigan: 2017 – Present

Partner, 2022 – Present Of Counsel, 2017 – 2022

Practice includes business/corporate law and transactions, monitorships, receiverships, internal investigations, corporate compliance, white collar defense, and telecommunications law

United States Attorney

Western District of Michigan: 2012 – 2017

Presidentially-appointed, Senate-confirmed, chief legal and law enforcement officer overseeing federal criminal prosecutions, civil actions, investigations, bankruptcy proceedings, and monitorships within 49 counties and 11 federally recognized Native American tribes as well as fostering law enforcement and community relations

Dickinson Wright PLLC

Grand Rapids, Michigan: 2006 – 2012

Member

Practice included business/corporate law and transactions and telecommunications law

Varnum, Riddering, Schmidt & Howlett LLP

Grand Rapids, Michigan: 1991 – 2006

Partner, 1997 – 2006 Associate, 1991 – 1996

 $Policy/Management\ Committee,\ 2002-2004$

Practice included business/corporate law and transactions and local government cable television and telecommunications law

Admitted to Practice:

United States Supreme Court

United States Court of Appeals for the Sixth Circuit

United States District Courts for the Western and Eastern Districts of Michigan

Michigan State, Circuit, and District Courts

Professional Affiliations

National Association of Federal Equity Receivers, Associate Member

National Association of Former United States Attorneys, Member

Wolverine Bar Association, Member

Floyd Skinner Bar Association, Member

Grand Rapids Bar Association, Member

State Bar of Michigan, Member

Community and Professional Service

Hope Network Board of Directors: Secretary; Executive Committee (2007 – 2012, 2019 – Present)

Spectrum Health Hospitals Foundation Board of Trustees (2018 – Present)

Grand Rapids Christian Church Board of Directors: Secretary (1992 – 2012, 2017 – Present)

Grand Rapids Black Chamber of Commerce: President (2011 – 2012)

Greater Grand Rapids YMCA Board of Directors: Treasurer; Finance Committee Chair (2007 – 2012)

Spectrum Health Hospitals Board of Directors: Treasurer; Executive Committee; Finance Committee Chair (2004 – 2012)

Spectrum Health Helen DeVos Childrens Hospital Foundation Board of Trustees: Vice Chair (1999 – 2012)

Aquinas College Board of Trustees: Chairman; Secretary; Executive Committee; Enrollment Management Committee Chair (1993 – 2002, 2003 – 2012)

Grand Rapids Bar Association: President; President-Elect; Vice President; Trustee; Diversity Committee Chair (1999 – 2005)

City of Grand Rapids Local Officers' Compensation Commission (2002 – 2006)

Inner-City Christian Federation/Nonprofit Housing Corporation Board of Directors: President; Vice President; Treasurer; Executive Committee; Finance Committee Chair (1994 – 2003)

Grand Rapids Downtown Management Board, Inc. Board of Directors: Vice President; Treasurer; Executive Committee (1993 – 1998)

Arbor Circle Corporation Board of Directors (1996 – 1997)

Advisory Center for Teens Board of Directors: Treasurer; Executive Committee; Finance Committee Chair; Arbor Circle Merger Committee (1993 – 1995)

City of Grand Rapids Board of Canvassers (1994 – 1996)

World Affairs Council of Western Michigan Board of Directors (1993 – 1996)

Downtown Grand Rapids Optimist Club Board of Directors (1993 – 1995)

Grand Rapids Area Chamber of Commerce: Minority Business Month and Minority Business Committees (1991 – 1995)

West Michigan/St. Petersburg International Exchange Council Board of Directors (1993 – 1994)

Honors and Awards

Martindale-Hubbell, AV Preeminent

Michigan Super Lawyers

Michigan State Bar Foundation Fellow

National Organization of Black Law Enforcement Executives, Civil Rights Justice By Action Award (2014)

Employer Support Group of The U.S. Guard and Reserve, Patriot Award (2013)

Greater Grand Rapids Branch NAACP, Floyd Skinner Award (2004, 2012)

Michigan Jaycees, Outstanding Young Michigander Award (2005)

Business Direct Weekly, 40 Business Leaders Under 40 (2004)

Grand Rapids Giants, Floyd Skinner Justice Award (2003)

Grand Rapids Business Journal, 40 Under 40 (1998, 2002, 2004, 2007); Distinguished Alumnus (2015)

State Bar of Michigan, Outstanding Young Lawyer Award (1996)

Heart of West Michigan United Way Project Blueprint, Non-Blueprint Graduate Award "Outstanding Leadership and Involvement Increasing Community Inclusiveness" (1996)

National Association of Telecommunications Officers and Advisors, National Appreciation Award (1995)

Grand Rapids Area Chamber of Commerce, Volunteer of the Month Award (November 1993)

ATTACHMENT B



April 2022

Executive Summary

National Footprint

Barnes & Thornburg is a full-service national law firm that advises on legal and regulatory matters across the country and throughout the world. Our attorneys practice from more than 20 offices, including in Atlanta, Boston, California, Chicago, Delaware, Florida, Illinois, Indiana, Michigan, Minneapolis, New York, Ohio, Raleigh, Salt Lake City, Texas, and Washington, D.C., which enables our firm to act as counsel for receivers and other fiduciaries in civil regulatory enforcement actions throughout the United States. As one of the 100 largest firms in the country, we have experience in all practice areas arising from civil and criminal enforcement actions.



FTC Receivership Experience

This proposal provides a summary of Barnes & Thornburg's extensive experience representing receivers and other fiduciaries in Federal Trade Commission enforcement actions, as well as other federal regulatory receiverships. We focus on locating, securing, and recovering assets and taking all other steps necessary to maximize recovery for the receivership estate and defrauded consumers efficiently and cost-effectively. The proposal assumes that we will work within the billing parameters for receivership engagements in comparable government engagements. Our team is flexible and willing to serve in the capacity that provides the greatest impact and value.

An Experienced Team

The firm employs a working-attorney model, which means that each of the lawyers selected to work on a government receivership rolls up his or her sleeves and actively participates in achieving the receivership's ends. This model allows us to provide the highest quality legal representation at a reasonable price. Barnes & Thornburg also maintains relationships with financial services consultants and other industry professionals to assist as necessary with market- or industry-specific challenges that arise in the course of a receivership.

Our firm includes attorneys who oversaw receiverships during their terms of service at various regulatory agencies and the U.S. Attorney's Office. We draw from our deep bench of talent and vast resources across our other offices to ensure we provide the most cost-effective representation possible. Biographies of proposed team members for this engagement are included at the end of this proposal; however, we regularly evaluate the team and expertise required as the engagement unfolds and adjust accordingly.

Federal Regulatory Receiverships

Barnes & Thornburg has represented federal equity receivers in dozens of FTC matters across the country that involved a full range of receivership services including locating, securing, and recovering assets, monetizing and maximizing the value of those assets, bringing ancillary litigation for the benefit of the receivership estate and, where appropriate, administering ongoing businesses. Our attorneys have also acted as counsel for receivers in other regulatory receiverships brought at the behest of other federal regulatory agencies, including the SEC, CFTC, and CFPB. Where required, we have helped develop and implement distribution plans for defrauded consumers. At every step of the way, we pride ourselves in evaluating the cost benefit of our activities, cognizant of our fiduciary responsibilities to minimize expenses and maximize recovery.

We have assisted receivers in recovering assets, liquidating and monetizing real and personal property assets, and bringing clawback actions and other lawsuits against third parties to recover estate assets. We have successfully clarified or expanded receivership appointment orders and, when necessary, sought and obtained civil contempt orders against defendants and third parties to ensure that all appropriate assets are recovered and brought into the receivership estate for the benefit of defrauded consumers. Our broad receivership experience makes Barnes & Thornburg particularly well suited to work alongside government regulators in federal equity receivership matters and, when the occasion arises, to work alongside criminal authorities in parallel proceedings involving both civil enforcement agencies and criminal authorities.

Administration and Operations

Barnes & Thornburg regularly advises receivers and other fiduciaries in their efforts to preserve and protect assets subject to the receivership. This includes counseling the receiver on all aspects of receivership administration and operations including business operations, property preservation, insurance issues, tax requirements, environmental compliance, and labor and employment issues. Our team also has significant experience addressing real and personal property issues that arise in the course of federal equity receiverships, such as property maintenance and repair, property management, secured creditor claims, and leasehold issues.

Asset Sales

We have significant experience assisting receivers in their efforts to market and sell all types of real and personal property of the receivership estate, in compliance with the requirements of federal law and court orders, including negotiating and documenting sale transactions and obtaining court approval for proposed property sales.

Fiduciary Duties

Like trustees in bankruptcy, receivers are charged with the duties of care, loyalty, and obedience. Our team understands that complicated situations frequently arise involving various constituencies in complex FTC equity receivership matters. We carefully advise receivers so that they discharge their fiduciary duties diligently and appropriately.

Representative FTC Receivership Experience

Midwest Experience

FTC v. Sellers Playbook, Inc., District of Minnesota

Represented Receiver appointed to take control of companies engaged in deceptive marketing practices.

Southwest Experience

FTC v. Assail, Western District of Texas

Represented Receiver appointed in FTC action in connection with a telemarketing operation with a complex web of companies engaged in deceptive marketing practices. Successfully litigated multiple contempt actions and turnover actions to compel return of receivership funds leading to the recovery of substantial assets for the estate. In connection with this Receivership, successfully obtained a Fifth Circuit order affirming the Receiver's recovery of assets paid to attorneys obtained from ill-gotten gains. The opinion by the Fifth Circuit has been widely cited regarding a lawyer's duty to inquire about the source of their fees when a temporary restraining order and asset freeze have been imposed in a federal equity receivership.

FTC v. Bob Robinson, LLC and Mega Export 2005, Inc., Southern District of Texas

Served as counsel to Receiver who took control of entities' advertising and promoting work from home opportunities, and recovered assets in the U.S. and abroad.

Western Experience

FTC v. Johnson, District of Nevada

Represented Receiver appointed in FTC action involving fraudulent internet operations resulting in a judgment in favor of the FTC in excess of \$280 million. Obtained an order, affirmed at the Ninth Circuit, clarifying the scope of the receivership to include an additional 78 entities and the assets of several non-defendants, which paved the way for the recovery of an additional \$14 million for the estate. Over \$31 million in assets was recovered and liquidated during the course of the receivership.

FTC v. J.K. Publications, Inc., Central District of California

Represented Receiver in FTC action involving \$45 million internet credit card fraud, resulting in \$37 million FTC judgment. Assisted the Receiver in identifying undisclosed assets of \$21 million and obtaining the repatriation of \$10 million from the Cayman Islands and nearly \$8 million from Vanuatu. The Receiver ultimately recovered over 97% of the amounts taken from consumers.

FTC v. AWS, LLC, FBA Distributors, LLC and FBA Stores, LLC, District of Nevada

Represented Receiver appointed to take control of companies engaged in deceptive marketing practices and successfully resolved numerous disputes with credit card merchant processors without the need for expensive litigation which, along with other asset recoveries, resulted in disbursing over \$7 million to the FTC for consumer redress.

FTC v. A1 DocPrep Inc., Central District of California

Represented Receiver who took control of companies engaged in deceptive telemarketing practices.

FTC v. M&T Financial Group d/b/a StuDebt, Central District of California

Represented Receiver appointed to take control of companies engaged in deceptive telemarketing practices.

East Central Experience

FTC v. Ameridebt, District of Maryland; Robb Evans & Assoc., LLC v. Holibaugh, Fourth Circuit

Represented Receiver appointed in FTC action against a fraudulent debt counseling company involving \$172 million in consumer claims. Successfully litigated contested contempt proceedings, which ultimately played a key role in the recovery of more than \$25 million in real and personal property assets diverted and hidden from the Receiver throughout the world. Total assets of nearly \$50 million were ultimately recovered. In a related appeal, the Fourth Circuit addressed whether a federal court had jurisdiction over a recovery action filed by the Receiver to enforce a note arising from the Receivership estate. The Fourth Circuit concluded that because the federal district court had jurisdiction over the original FTC action, it possessed ancillary jurisdiction over an action brought by a Receiver in furtherance of its appointment, and clarified that 28 U.S.C. § 1367 does not affect common law ancillary jurisdiction over related proceedings that are technically separate from the initial case that invoked federal subject matter jurisdiction.

FTC v. Ecological Fox, LLC (In re Sanctuary Belize Litigation), District of Maryland

Representing Receiver appointed to take control of numerous companies and the assets of three individual defendants alleged to be engaged in deceptive marketing and sale of real estate in Belize and other foreign jurisdictions, leading to consumer losses alleged to exceed \$125 million. This matter involves the same principal defendant named in the *FTC v. Ameridebt* matter.

Sam Wang Produce, Inc. v. MS Grand, Inc., District of Maryland

Represented Receiver in handling all transactional aspects of the sale and liquidation of grocery stores, as well as litigating creditor claims and judicial approval of real estate sales. Recovered \$7.55 million for Receivership through the sale of various assets.

Representative SEC and CFTC Receivership Experience

Los Angeles / San Francisco Regional Office

SEC v. Lewis, Central District of California

Represented Receiver in SEC action involving a \$150 million Ponzi scheme, at the time considered to be the longest running Ponzi scheme on record. Successfully brought extensive clawback actions against a multitude of investors and assisted in the liquidation of various real and personal property assets.

SEC v. Heath, Central District of California

Represented Receiver in SEC action involving a \$100 million Ponzi scheme. Assisted in the recovery of over \$32 million in diverse real and personal property assets, including ownership interests in fast food restaurants, a hotel and conference center, residential and commercial real properties, and undeveloped land. Initiated litigation resulting in a successful multi-million dollar settlement enforcing distributorship agreements with a major fast food franchisor.

SEC v. Finbar, Central District of California

Represented Receiver in SEC action involving the last of a series of Ponzi scheme activities undertaken by the wrongdoer. Successfully argued that the activities were part of an ongoing Ponzi scheme for asserting an interest in real and personal property subject to multiple civil asset forfeiture actions. Settlement with the U.S. Attorney and the Asset Forfeiture and Money Laundering Section of the Department of Justice led to the recovery of over \$1.7 million, which enabled the defrauded investors to receive a return of 19.7% of their investment instead of zero.

SEC v. MX Factors, Central District of California

Served as counsel for Receiver who took control of companies operating a Ponzi scheme. Successfully prosecuted clawback actions.

SEC v. Ohana, Central District of California

Served as counsel for Receiver who took control of companies operating a Ponzi scheme. Successfully prosecuted clawback actions.

SEC v. AOB Commerce, Central District of California

Served as counsel for Receiver who seized the offices and took control of companies offering unregistered securities in an ongoing Ponzi-like scheme.

SEC v. Homestead Properties, Central District of California

Served as counsel for Receiver. Assisted Receiver in taking control of an investment fund alleged to have violated the partnership private placement memorandum.

SEC v. Christian Stanley, Central District of California

Served as counsel for Receiver of a company offering fraudulent, unregistered securities.

SEC v. TLC, Central District of California

Served as special litigation counsel to Receiver who took control of a company conducting a real estate investment Ponzi scheme involving more than 450 properties throughout the country. Successfully prosecuted clawback actions and other litigation, helping to return more than 60% of principal to defrauded investors.

SEC v. Global Money Management, Southern District of California

Appointed Receiver for hedge fund that raised nearly \$100 million for an options-driven investment program which evolved into a Ponzi scheme. Assembled and consolidated firm assets and transferred them to a bankruptcy estate, which was able to return \$31.7 million to 200 investors. This represented a return of approximately 45% of the investors' net losses.

SEC v. Pinnfund USA, Inc., Southern District of California

Appointed Receiver of investment firm that misappropriated \$330 million purportedly for funding the writing of residential home mortgages. The Receivership pressed several litigations and was able to recover a substantial portion of investors' losses.

CFTC v. Khanna, Southern District of California

Appointed Receiver to take over the operations of investment firm involved in a Ponzi scheme, seize misappropriated assets, and trace financial transactions worldwide, which ultimately resulted in a recovery of approximately 27% of the loss suffered by investors.

Chicago / Central Regional Office

SEC v. Hyatt Capital, Northern District of Illinois

Served as counsel to one of several receivers and returned to investors the balance of their capital contributions of approximately \$21.4 million, as well as multiple dividends which exceeded \$15 million.

SEC v. Petters, District of Minnesota

Represented claimants, victims, and wrongdoers in receiverships.

SEC v. Goyal, Northern District of Illinois

Successfully assisted victims in recovering \$1 million invested in Ponzi scheme through fast-acting litigation strategy pursued in state court in Miami and cooperation with federal authorities in the U.S.

CFTC v. AlphaMetrix, LLC, Northern District of Illinois

Served as Receiver and counsel in action involving a well-known Chicago-based technology trading platform overseeing \$681 million in investments. The CFTC commenced a civil action in late 2013 due to irregularities with expenses taken from platform's account holders.

CFTC v. Velazquez, Northern District of Illinois

Served as Receiver's counsel in action involving investment fund that fraudulently solicited \$2.4 million from investors. Assisted with the recovery of money in a Swiss bank account, sale of Chicago real estate, and formulation of a plan of distribution of approximately \$1.9 million to 65 investors.

CFTC v. Raleigh Capital Management, Inc., Northern District of Illinois

Served as Receiver's counsel and aided in marshalling and selling Chicago real estate owned by Raleigh Capital Management, Inc., a fraudulent investment fund that claimed \$8.3 million in assets. In addition, located and sold aircraft and automobile owned by the fund principal, assisted in collecting assets held in a Swiss bank, and worked with the Receiver to dispose of certain commercial real estate interests owned by the fund, resulting in distribution of \$1.2 million to claimants.

New York Regional Office

SEC v. WG Trading Investors, L.P. and CFTC v. Walsh, Southern District of New York

Representing Receiver as co-counsel in SEC and CFTC actions brought in connection with a \$1.5 billion Ponzi scheme. Assisted Receiver in liquidating equity portfolio and brought extensive clawback litigation against winning investors. Defrauded investors have received 100% recovery on their allowed claims.

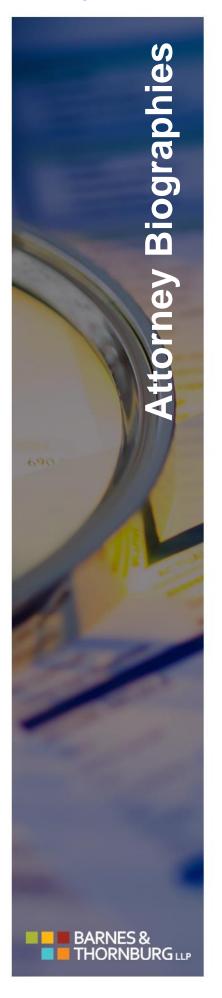
SEC v. Byers, Southern District of New York

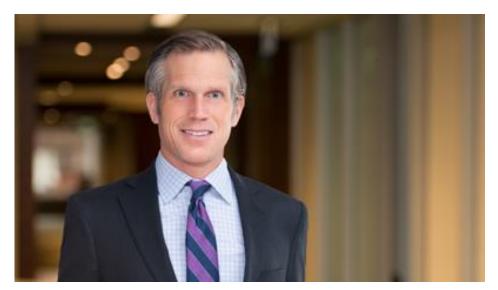
Served as Receiver's counsel in fraud action involving a multinational private equity, commodities, and real estate firm. Advised Receivership in its management of more than \$500 million in claims and 35 related law suits filed in state and federal courts.

Proposed Team and Rates

In general, we find that our clients prefer our hourly rates due to our competitive structure. Our standard rates are, on average, 19% less than our AmLaw 100 competitors (*Thomson Reuters*, 2021). Our rates are among the lowest for national, full-service firms because we keep our costs low and pass it on to clients. We eschew leverage and focus on partners providing the right advice and counsel quickly and efficiently. We are known in the industry for lean staffing and our efficient use of personnel allows us to staff matters in the most cost-effective manner.

Team Member	Title	Location	2022 Standard Billing Rate	2022 Proposed Case Rate	% Discount Applied
David Hall	Of Counsel	Grand Rapids	\$580	\$522	10%
Gary Caris	Partner	Los Angeles	\$830	\$598	28%
Mark Owens	Partner	Washington, D.C.	\$790	\$593	25%
Anthony Sallah	Partner	Grand Rapids	\$500	\$450	10%
Erika Weiss	Associate	Grand Rapids	\$470	\$423	10%
Trevor Mason	Associate	Grand Rapids	\$355	\$319	10%
Allison Cole	Associate	Minneapolis	\$420	\$378	10%
Sofia Shaw	Paralegal	Minneapolis	\$310	\$279	10%





Knowledgeable, pragmatic and responsive, David Hall focuses his practice in the areas of corporate finance, and business reorganization and restructuring. Having worked on numerous large and complex debt financing and restructuring transactions over the course of his career, David understands the challenges that businesses, financial institutions and their leaders encounter in virtually all matters of commercial lending, restructuring, workout and turnaround.

With an approach that is concentrated on achieving business goals and objectives, David has vast experience successfully guiding business leaders through difficult negotiations in complex transactions, in and out of court, while managing business and legal risk. As an attentive trusted advisor, David assists clients in structuring, negotiating and documenting credit facilities for borrowers and lenders, and developing and implementing strategies to improve business operations, monetize assets and restructure debt.

David's financing experience includes commercial financing, real estate and construction financing, acquisition and mezzanine financing, and state and municipal finance, including tax-exempt bond issuances. His restructuring experience includes receiverships, out-of-court restructuring transactions, turnarounds, and complex workouts across a wide variety of sectors, having represented debtors, secured creditors, asset purchasers and other parties in interest in some of the largest Chapter 11 bankruptcies in the country and the City of Detroit's historic Chapter 9 proceedings.

Prior to joining Barnes & Thornburg, David honed his strengths working for two of the largest international Am-100 law firms in the country, and serving as deputy general counsel to the Governor of Illinois in the Office of Management and Budget.

Professional and Community Involvement

Member, Economic Club of Grand Rapids

Member, Turnaround Management Association (TMA)

Member, TMA West Michigan Chapter

Member, Association for Corporate Growth Planning Committee

Member, American Bankruptcy Institute

Member, National Association of Bond Lawyers

David A. Hall

Of Counsel

171 Monroe Avenue N.W. Suite 1000 Grand Rapids, MI 49503-2694

P 616-742-3954 F 616-742-3999 David.Hall@btlaw.com

EDUCATION

The John Marshall Law School, J.D., summa cum laude, 2003

Michigan State University, B.A., 1999

BAR ADMISSIONS

Illinois

Michigan

CLERKSHIPS

Honorable Bruce W. Black (Ret.), U.S. Bankruptcy Court for the Northern District of Illinois

COURT ADMISSIONS

U.S. District Court for the Northern District of Illinois

PRACTICES

Creditors' Rights, Restructuring and Bankruptcy

Bankruptcy

Corporate

Venture Capital and Private Equity

Loan Documentation and Financing

INDUSTRIES

Lending and Structured Finance

Member, National Association of Federal Equity Receivers (NAFER) International Committee

Member, Chicago Bar Association

Adjunct faculty member, The John Marshall Law School

Volunteer, East Grand Rapids Schools Foundation

Volunteer, West Michigan Land Conservancy Land Protection Committee

Former Volunteer, Michigan Trails & Greenways Coalition

Experience

Bankruptcy

- Represented Byline Bank as senior lender to Boyce Hydro Boyce Hydro Power in connection with the companies' chapter 11 proceedings in the Eastern District of Michigan
- Represented the City of Detroit in negotiation, documentation and approval of \$120 million post-petition bond financing in the City's chapter 9 bankruptcy proceedings
- Represented the City of Detroit in successful tender offer of approximately \$1.47 billion of Detroit Water and Sewerage Department revenue bonds
- Represented Jefferies & Company as administrative agent and lender in connection with New LightSquared LLC, \$3.1 billion junior lien bankruptcy exit facility
- Represented Alpha Natural Resources, Inc. and certain of its affiliates in connection with documentation and approval of \$692 million debtor-inpossession financing package
- Represented American Apparel, Inc. in connection with \$90 million debtor-inpossession credit facility and \$120 million exit facility
- Represented RadioShack Corporation in connection with \$285 million debtorin-possession credit facility
- Represented an ad hoc committee of secured term loan lenders in connection with the chapter 11 cases of Southcross Holdings LP and its affiliated debtors, which resulted in the restructuring of approximately \$566 million of secured term loan debt
- Represented Penton Business Media Holdings, Inc. in its chapter 11 bankruptcy proceedings
- Represented Meridian Automotive Systems in its chapter 11 proceedings
- Represented Boscov's Department Stores in its chapter 11 bankruptcy proceedings

Finance

- Represented an American commercial bank, as administrative agent and lender, in connection with \$44,000,000 senior secured revolving and term loan credit facility to high volume precision machining component part supplier to Tier 1 automotive parts suppliers
- Represented a U.S. bank in connection with \$50,000,000 loan to high value machining and manufacturing solutions company
- Represented a South Carolina based client in the agriculture and biotech industry and its affiliated entities in connection with \$40,000,000 term loan

project financing facility and a \$45,000,000 Series C common stock equity raise

- Represented a commercial bank based in Chicago, Illinois as lender in a \$13,400,000 revolver, delay-draw term and capital expenditure financing facility in the manufacturing industry
- Represented a bank based in Chicago, Illinois in multiple transactions including:
 - Its \$15,000,000 loan in the manufacturing industry
 - As lead arranger and senior lender in a \$230,000,000 syndicated loan facility to a rapidly expanding insurance brokerage company based in the Midwest
 - As senior lender and documentation agent in syndicated loan to multi-national automobile parts supplier in connection with \$150,000,000 loan facilities
- Represented one of the largest banks in the U.S. and certain of its affiliates in various tax-exempt healthcare bond financings throughout Midwest
- Represented one of the largest banks in the U.S. in connection with documentation of revolving facility to producer of state of the art foam products for retail, distribution, and professional sales
- Represented a regional bank in connection with real estate construction loan to West Michigan condominium and apartment development project
- Represented tier two automotive supplier and its domestic and Mexican subsidiaries in connection with \$130,000,000 senior secured term and revolving credit facility
- Represented tier two automotive supplier in negotiation and documentation of multi-lender \$97,000,000 term and revolving credit facility
- Represented national trucking and logistics company in connection with negotiation and documentation of \$75,000,000 term and revolving credit agreement
- Represented oil field services company in connection with a \$70 million senior secured term and revolving facility

*Some of these matters occurred prior to joining Barnes & Thornburg.



Gary Caris represents receivers and creditors in federal, bankruptcy and state courts. At every turn, Gary is committed to maximizing recovery for the receivership estate or creditor client by achieving cost-effective results, whether inside or outside the courtroom.

Gary represents receivers who have been appointed in enforcement actions brought by various federal agencies, including the Federal Trade Commission (FTC), Securities and Exchange Commission (SEC), Consumer Financial Protection Bureau (CFPB) and Commodity Futures Trading Commission (CFTC). He has represented federal equity receivers in more than 45 such actions across the country. Because each receivership matter is unique, Gary brings his legal creativity and problem-solving skills to every matter.

With regard to complex bankruptcy litigation, reorganization proceedings and commercial litigation, Gary regularly counsels financial institutions and other creditors. Relentlessly results-focused, Gary works collaboratively with his clients to understand their goals and consistently achieve such objectives through diligent advocacy and superior strategy.

Professional and Community Involvement

Member, National Association of Federal Equity Receivers (NAFER) Best Practices Committee; member, Amicus Committee

Former board member, NAFER, 2013 – 2016

Frequent presenter at NAFER and California Receivers Forum conferences

Experience

Represented Receiver appointed in FTC action against a fraudulent debt counseling company involving \$172 million in consumer claims. Successfully litigated contested civil contempt proceedings which ultimately played a key role in the recovery of over \$25 million in real and personal property assets diverted and hidden from the Receiver throughout the world, including in Belize and Latvia. Total assets of over \$50 million were ultimately recovered. In connection with this receivership, successfully obtained a 4th Circuit order affirming a judgment and holding that the District Court had ancillary jurisdiction in connection with litigation of pure state law claims against third parties. (Robb Evans & Associates LLC v. Holibaugh, 609 F. 3d 359 - 4th Cir. 2010).* Currently represents Receiver in related new FTC action involving

Gary Owen Caris

Partner

2029 Century Park East Suite 300 Los Angeles, CA 90067

P 424-363-2920 F 310-284-3894 gcaris@btlaw.com

EDUCATION

University of California, Los Angeles, J.D., 1979

California State University, Northridge, B.A., summa cum laude, 1976

BAR ADMISSIONS

California

PRACTICES

Creditors' Rights, Restructuring and Bankruptcy

Receiverships

Asset Revitalization

the purported fraudulent sale of Belize real estate to consumers in the United States and elsewhere.

- Represented Receiver appointed in FTC action involving fraudulent internet operations resulting in a judgment in favor of the FTC in excess of \$280 million. Obtained an order, affirmed at the 9th Circuit, clarifying the scope of the receivership to include an additional 78 entities and the assets of several non-defendants which paved the way for the recovery of an additional \$14 million for the estate. Over \$31 million in assets was recovered and liquidated during the course of the receivership.
- Represented Receiver appointed in FTC action in connection with a telemarketing operation with a complex web of companies engaged in deceptive marketing practices. Successfully litigated multiple contempt actions and turnover actions to compel return of receivership funds leading to the recovery of substantial assets for the estate. In connection with this receivership, successfully obtained a 5th Circuit order affirming the Receiver's recovery of assets paid to attorneys obtained from ill-gotten gains. (FTC v. Assail, 410 F. 3d 256 5th Cir. 2005)*
- Represented Receiver in FTC action involving \$45 million internet credit card fraud, resulting in \$37 million FTC judgment. Assisted the Receiver in identifying undisclosed assets of \$21 million and obtaining the repatriation of \$10 million from the Cayman Islands and nearly \$8 million from Vanuatu. The Receiver ultimately recovered over 97% of the amounts taken from consumers.
- Represented Receiver appointed in SEC action involving a 17-year long \$150 million Ponzi scheme, at the time considered the longest running Ponzi scheme on record. Successfully brought extensive clawback actions against a multitude of winning investors and assisted in the liquidation of various real and personal property assets.*
- Represented Receiver appointed in SEC action involving a \$100 million Ponzi scheme. Assisted in the recovery of over \$32 million in diverse real and personal property assets, including ownership interests in fast food restaurants, a hotel and conference center, residential and commercial real properties and undeveloped land. Brought litigation resulting in a successful multi-million dollar settlement to enforce distributorship agreements with a major fast food franchisor.*
- Represents Receiver as co-counsel in SEC and CFTC actions brought in connection with a \$1.5 billion Ponzi scheme. Assisted the Receiver in liquidating equity portfolio and brought extensive clawback litigation against winning investors. Defrauded investors have received 100% recovery on their allowed claims.
- Represented Receiver in SEC action involving the last of a series of Ponzi scheme activities undertaken by the wrongdoer. Successfully argued that the activities were part of an ongoing Ponzi scheme for the purpose of asserting an interest in real and personal property subject to multiple civil asset forfeiture actions. Settlement with the United States Attorney and the Asset Forfeiture and Money Laundering Section of the Department of Justice led to the recovery of over \$1.7 million which enabled the defrauded investors to receive a return of 19.7% of their investment instead of zero.*

*These matters, in their entirety, occurred prior to joining Barnes & Thornburg.



As chair of the firm's Finance, Restructuring and Bankruptcy department, Mark Owens' practice includes business, commercial, finance, litigation, bankruptcy and creditors' rights matters valued from millions to billions of dollars. Responsive, grounded and calm under pressure, clients trust and rely upon Mark to protect their assets and interests when safeguarding their position at every turn.

Mark advises on complex workouts and loan restructurings, representing secured and unsecured creditors, creditors' committees, preference and fraudulent transfer defendants, lessors and landlords in bankruptcy cases. Mark provides legal counsel on repossessions, general collections and Uniform Commercial Code issues. He is also involved in commercial litigation in numerous courts throughout the country.

Notably, Mark maintains multijurisdictional licenses to practice law, which allows him to truly serve clients on a national scale. He is appreciated for his honest and realistic assessments of client positions, and for providing viable, practical options and actionable solutions to maximizing recovery.

In addition, Mark is chair of the firm's national Motorsports team. Mark's passion for auto racing is manifest in his commitment to serving drivers, teams, sponsors and industry constituents in the full array of commercial contract issues they face.

Regardless of the industry or circumstances, Mark steadfastly focuses on realizing the desired result in even the most difficult environments for the clients he serves, which often includes preventive advice and counsel. As a result, Mark also identifies and reworks standard agreements in order to better safeguard his client from exposure going forward.

Mark is not regularly admitted to practice law in the local courts of the District of Columbia and is working under the supervision of a member of the D.C. Bar pending his admission.

Professional and Community Involvement

Mark is a member of numerous professional organizations in his practice areas.

Mark R. Owens

Partner

1717 Pennsylvania Avenue N.W. Suite 500 Washington, D.C. 20006-4623

P 317-231-7459 F 202-289-1330 mark.owens@btlaw.com

EDUCATION

Widener University Delaware Law School, J.D., cum laude, 1999

Wilkes University, B.B.A., magna cum laude, 1995

Bloomsburg University, M.Ed., 1999

BAR ADMISSIONS

Delaware

Indiana

New Jersey

Pennsylvania

COURT ADMISSIONS

- U.S. Bankruptcy Court for the District of Delaware
- U.S. Bankruptcy Court for the District of New Jersey
- U.S. Bankruptcy Court for the Eastern District of New York
- U.S. Bankruptcy Court for the Eastern District of Pennsylvania
- U.S. Bankruptcy Court for the Middle District of Pennsylvania
- U.S. Bankruptcy Court for the Northern District of Indiana
- U.S. Bankruptcy Court for the Southern District of Indiana
- U.S. Bankruptcy Court for the Southern District of New York
- U.S. Court of Appeals for the Second Circuit

Experience

- Represented a Texas private equity fund in its bid, related capital raise, and acquisition of substantially all CBD drug assets (therapies, patents and facilities) from debtor, a nationally prominent pharmaceutical manufacturer (which had filed for bankruptcy protection related to its portfolio of opioid drug therapies) via a bankruptcy 363 sale and auction administered by the United States Bankruptcy Court for the District of Delaware. The debtor was profiled on the television documentary American Greed
- Assisted client in negotiating, documenting and securing approval of purchase of significant limestone reserves and other assets from Bankruptcy Estate. In re Smith Mining Materials, Inc., No. 06-30259 (Bankr. W.D. Ky. 2006)
- Representation of automotive suppliers, aircraft lessor, health insurance provider, and governmental authorities with tax claims in Chapter 11 case of tier one automotive supplier
- Representation of investment banking firm with administrative claims for services rendered during Chapter 11 case

- U.S. Court of Appeals for the Third Circuit
- U.S. District Court for the District of Delaware
- U.S. District Court for the District of New Jersey
- U.S. District Court for the Eastern District of New York
- U.S. District Court for the Eastern District of Pennsylvania
- U.S. District Court for the Middle District of Pennsylvania
- U.S. District Court for the Northern District of Indiana
- U.S. District Court for the Southern District of Indiana
- U.S. District Court for the Southern District of New York

PRACTICES

Receiverships

Creditors' Committees

Special Servicers

Distressed M&A and Special Situations

Corporate Counsel Services

INDUSTRIES

Motorsports

Agriculture and Food

Financial Services

Telecommunications



Anthony Sallah knew very early on that practicing law was what he wanted to do. Diligent and practical, Anthony is able to navigate clients through complex commercial or construction disputes, while guiding them toward their most desired result.

Anthony counsels institutional and individual clients in complex commercial litigation and construction matters in federal and state court, at the trial and appellate level. Anthony also has deep experience before numerous arbitration tribunals, including the American Arbitration Association (AAA), JAMS, and in arbitrations governed by international rules. He focuses on devising and implementing creative and unique solutions to help clients succeed, doing so through the most efficient manner possible.

He represents clients in the prosecution and defense of construction claims involving deficient design, productivity and scheduling, acceleration and compression, and defective work. He has litigated on behalf of and against owners, private equity lenders, contractors, designers, sureties, and engineering professionals in complex construction environments, including oil refineries, large-scale industrial facilities, mixed-use developments, and university projects.

Anthony also has extensive experience defending clients in product liability and consumer-related class action litigation. He has represented his clients in product liability and class action claims of virtually all sizes through the country across a variety of industries, including health care, banking, energy, manufacturing and telecommunications.

A testament to his skills, while with his former firm, Anthony was the lead associate in helping a global medical manufacturer secure a \$645+ million judgment in federal court. That litigation team was recognized as Law360 "Legal Lions" for their efforts.

Anthony brings a positive energy to his work. He collaborates with a variety of personalities in, sometimes challenging, commercial settings to help his clients achieve their goals, whether it be through early intervention, in arbitration or negotiation, or in litigation.

Professional and Community Involvement

Member, American Bar Association Construction Law Forum

Member, Ohio State Bar Association

Member, Grand Rapids Bar Association

Anthony C. Sallah

Partner

171 Monroe Avenue N.W. Suite 1000 Grand Rapids, MI 49503-2694

P 616-742-3976 F 616-742-3999 anthony.sallah@btlaw.com

EDUCATION

University of Toledo College of Law, J.D., magna cum laude, Order of the Coif, associate member of Law Review, recipient of DeArce-Koch Scholarship, 2014

University of Michigan, B.A., economics with a minor in political science, 2011

BAR ADMISSIONS

Michigan

Ohio

COURT ADMISSIONS

U.S. Court of Appeals for the Sixth Circuit

U.S. District Court for the Northern District of Ohio

U.S. District Court for the Southern District of Ohio

U.S. District Court for the Eastern District of Michigan

U.S. District Court for the Western District of Michigan

U.S. District Court for the District of Colorado

PRACTICES

Litigation

Construction

Member, Grand Rapids Chamber Emerging Leaders Cohort (2021)

Former board member, Adoption Network Cleveland

Former member, The William K. Thomas American Inn of Court

Honors

Top Lawyers, Grand Rapids Magazine, 2021

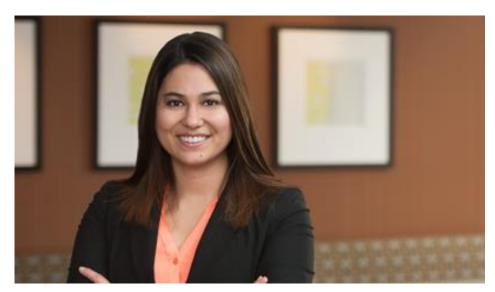
Experience

Litigation

- Obtained nine-figure judgment on behalf of global medical manufacturer against various business and individual defendants, alleging state and federal civil RICO violations, trademark infringement, and unfair competition
- Represented purchaser following a multimillion dollar acquisition involving claims for breach of contract, fraud, and intellectual property violations
- Obtained dismissal of a corporate defendant in putative class action involving alleged violations of the Telephone Consumer Protection Act and various state consumer protection statutes
- Obtained dismissal of managing member and limited liability company facing breach of fiduciary duty claims for alleged usurpation and competition
- Prosecuted federal and state trademark infringement, unfair competition, and tarnishment claims on behalf of manufacturer against various individual and corporate defendants

Construction

- Prosecuted and defended delay, disruption, and liquidated damages claims on an approximately 2,900 MW coal-fired power plant
- Prosecuted and defended extra work, liquidated damages, and wrongful termination claims on a 400,000 gallon-capacity oil refinery
- Represented nationwide contractor specializing in construction of urban towers and other vertical construction in disputes against owners, subcontractors, and design professionals
- Represented a design-builder in claims against design professional related to design and construction of a large infrastructure project in Pacific
- Successful appeal of a decision wherein the trial court erred in failing to conduct a hearing on the award of attorney's fees under Ohio's Prompt Payment Act



Erika Weiss brings a unique perspective – as the daughter of an entrepreneur and a former commercial litigator herself – to corporate clients in their finance and other business transactions. As a descendant of the Little Traverse Bay Bands of Odawa Indians, Erika is proud to be a cofounder of the firm's Native American Law and Policy group.

Erika provides clients with bank and borrower financing assistance and general counsel guidance in various business endeavors. She assists with a wide range of deals, from smaller loan transactions between single lenders and borrowers to multi-million dollar syndicate deals. Additionally, Erika also helps clients with documenting and negotiating entity formation, mergers, acquisitions, and other disposition transactions.

Within her general counsel practice, Erika focuses on offering tribal business clients comprehensive counseling on organizational structure and strategic economic development. Her American Indian Law knowledge and understanding extends into the government sector where she also advises on government service issues, such as ordinance, code and regulatory drafting and enforcement, as well as gaming and non-gaming economic development.

Because of Erika's experience in and outside of Indian Country, she is able to bridge the gap between tribal and non-tribal businesses seeking to work together, so that non-tribal businesses understand the complexities, nuances, and benefits of working with tribal businesses.

Erika's prior experience representing clients in commercial and securities litigation matters is key. It allows her to offer clients advice that takes into account what they need in the initial phases of their business and financing, as well as to how to assess and work to mitigate future risk.

Erika frequently represents the firm at national conferences and on panel discussions regarding economic development in Indian Country, and has launched and continues to develop a firm-supported podcast, Tribal talks. Together with her co-host, she discusses tribal economic development organizational structure, strategic planning, transaction due diligence, and more.

Professional and Community Involvement

Board member, ACG of West Michigan

Chair, ACG of West Michigan, Diversity and Inclusion Committee

Co-host, Barnes & Thornburg Tribal Talks Podcast

Erika Weiss

Associate

171 Monroe Avenue N.W. Suite 1000 Grand Rapids, MI 49503-2694

P 616-742-3984 F 616-742-3999 erika.weiss@btlaw.com

EDUCATION

Thomas M. Cooley Law School, J.D., magna cum laude, 2014

Grand Valley State University, B.A., 2011

BAR ADMISSIONS

Michigan

COURT ADMISSIONS

U.S District Court for the Western District of Michigan

Yavapai Apache Nation Tribal Court

PRACTICES

Construction

Native American Law and Policy

Insurance Recovery and Counseling

Corporate

INDUSTRIES

Charter Schools and School Innovation

Education

Member, Barnes & Thornburg Diversity, Equity and Inclusion Committee Member, Barnes & Thornburg Legal Personnel Administration Committee

Honors

Corporate Counsel Women of Color, Next Gen Emerging Leader Award, 2021 The Best Lawyers in America, Ones to Watch, 2021 Lawyers of Color, Hot List, 2020



Literally and figuratively quick on his feet, Trevor Mason is hard-working and dedicated to helping advise clients though a myriad corporate transactions. He efficiently identifies what's at issue and at stake for his clients, and then works diligently toward the most appropriate and beneficial outcome.

Trevor spent two summers with the firm before joining Barnes & Thornburg full-time, and gained experience working on-site with a large food service client to help with their in-house legal needs. He also worked on a wide range of legal research to assist with merger, acquisition, litigation, contractual, and transactional matters.

Before earning his law degree, Trevor was an athletics compliance intern with Michigan State University and the University of the Incarnate Word, where he gained several years of experience solving compliance issues facing higher education institutions in the athletics arena.

Trevor worked with state and federal rules and regulations of high school and collegiate athletics, as well as with National Collegiate Athletic Association (NCAA) policies, monitoring recruiting activities, conducting initial eligibility requests, and maintaining recruitment and confidential student-athlete NCAA documents.

While at Incarnate Word, Trevor was a four-year letter winner for the UIW football team. He was on the Academic All-Star Team for the Football Championship Subdivision Athletics Directors Association (FCS ADA) and on the Academic All-Conference First Team for the Southland Conference.

Professional and Community Involvement

Former president, Michigan State University Black Law Students Association

Trevor A. Mason

Associate

171 Monroe Avenue N.W. Suite 1000 Grand Rapids, MI 49503-2694

P 616-742-3933 F 616-742-3999 Trevor.Mason@btlaw.com

EDUCATION

Michigan State University College of Law, J.D., managing editor of MSU International Law Review, 2020

The University of the Incarnate Word, M.S., with distinction, sport management, 2017

The University of the Incarnate Word, B.A., cum laude, government, 2015

BAR ADMISSIONS

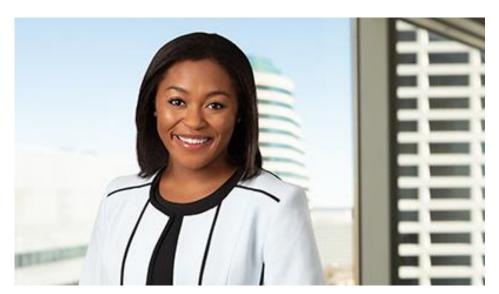
Michigan

PRACTICES

Corporate

INDUSTRIES

Colleges and Universities



A strong writer capable of crafting persuasive arguments on behalf of clients, Allison Cole is committed to assisting and guiding them in order to maximize their recovery for insolvency-related events.

She works with clients and creditors as they face virtually all types of insolvency, restructuring and bankruptcy matters and ensuing litigation.

Before joining Barnes & Thornburg full-time, Allison was a law clerk with the firm, where she developed an understanding of the needs of consumers and corporate entities regarding bankruptcy matters and regulatory changes and the skill for proactive problem solving.

During law school, Allison was a judicial extern and intern for Judge Susan Richard Nelson of the U.S. District Court for the District of Minnesota, where she conducted detailed legal research and prepared legal memoranda and orders. She also served as a judicial intern for Judge Amy Dawson of the Fourth Judicial District for the State of Minnesota, preparing briefs and clients for initial appearances.

Allison spent the summers during college as a production intern for a KMSP/WFTC Fox 9, writing stories and producing segments for its live morning show, as well as helping coordinate auditing and compliance needs.

Outside of her practice and volunteering, Allison enjoys playing the cello, singing and AMP Cycling with Life Time Fitness.

Professional and Community Involvement

Volunteer and corporate recruiter, Special Olympics Minnesota

Former counselor and manager, CedarS Camps

Former writer, Oberlin College GoYeo Storytellers

Former tutor and side leader, America Roads

Allison Cole

Associate

225 S. Sixth Street Suite 2800 Minneapolis, MN 55402-4662

P 612-367-8726 F 612-333-6798 allison.cole@btlaw.com

EDUCATION

University of St. Thomas School of Law, J.D., member of Journal of Law and Public Policy, Black Law Students Association, Delta Theta Phi Law Fraternity, 2021

Oberlin College, B.A., Oberlin College Law Scholar, Emma Bowen Fellow, politics, law and society, 2018

BAR ADMISSIONS

Minnesota

PRACTICES

Creditors' Rights, Restructuring and Bankruptcy



Sofia Shaw is a paralegal in the Minneapolis office of Barnes & Thornburg, where she is a member of the Finance, Insolvency and Restructuring Department.

Sofia assists with maintaining court deadlines for lawsuits in bankruptcy, federal and state courts. She processes incoming discovery requests, drafts responses and outgoing discovery requests to opposing counsel, and assists with document production. Sofia also prepares and files proofs of claim and fee applications.

Prior to joining Barnes & Thornburg, she was a bilingual paralegal at a private plaintiff's firm and a bilingual paralegal for the in-house counsel of Farmers Insurance Exchange. She also taught English in Spain in 2009 and 2010 through a grant with the Spanish Ministry of Education.

Honors

Turnaround Management Association (TMA) Transaction of the Year, 2018

Sofia Shaw

Paralegal

225 S. Sixth Street Suite 2800 Minneapolis, MN 55402-4662

P 612-367-8733 F 612-333-6798 sofia.shaw@btlaw.com

EDUCATION

Macalester College, B.A., 2009 Hamline University, Paralegal Certificate, 2014

PRACTICES

Creditors' Rights, Restructuring and Bankruptcy